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14 And Raymond Chenoweth*

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 FRANK COHN, Individually and on behalf on a
18 class of all similarly situated persons,

19 Case No.: 2:11-CV-1832-JCM-RJJ

20 Plaintiff,

21 vs.

22 RITZ TRANSPORTATION, INC., AWG
23 AMBASSADOR, LLC, ALAN WAXLER, and
24 RAYMOND CHENOWETH,

25 Defendants.

26 **STIPULATION AND ORDER FOR
27 STAY ALL PROCEEDINGS
(Third Request)**

28 Plaintiff, Frank Cohn, and defendants, Ritz Transportation, Inc., AWG Ambassador,
29 LLC, Alan Waxler, and Raymond Chenoweth, through their respective counsel, hereby submit
30 this stipulation and request to stay all proceedings in this matter until July 31, 2013. Such
31 stipulation is based upon the following:

32 1. The parties have engaged in a thorough exchange of relevant information.
33 2. Such exchange of information led the parties to a point in which they believe they
34 could engage in meaningful settlement discussions, and have done so.
35 3. This Court entered its Order on or about March 6, 2013 staying these proceedings to
36 allow the parties to engage in settlement discussions.

1 4. During the stay, the parties have had substantive settlement discussions.
2 5. The parties wish to continue these settlement discussions and are optimistic that such
3 discussions will prove to be successful.
4 6. In light of the foregoing, the parties request the Court stay all proceedings in this
5 matter until July 31, 2013. This is a 30 day stay and the parties believe that such time
6 is warranted to formulate a full resolution of all claims in this case.
7 7. This is the parties' third request for a stay, is made in good faith, and not made for
8 purposes of delay.

9 Submitted this 28th day of June, 2013.

10 By: /s/ Leon Greenberg
11 Leon Greenberg, ESQ.
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16 Attorney for Plaintiffs Frank Cohn, et al

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24 Attorney for Defendant Ritz Transportation, Inc.,
25 AWG Ambassador, LLC, Alan Waxler
26 And Raymond Chenoweth

27 **IT IS SO ORDERED:**

28 Dated this ____ day of _____, 2013.

29 _____
30 UNITED STATES DISTRICT/
31 MAGISTRATE JUDGE
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